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43. The removable medium recording station of claim 35 wherein the communications facility couples the removable medium recording station directly to a network port of the computer workstation.

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### REMARKS

The Office Action dated December 4, 2001 has been carefully reviewed.

Reconsideration of the grounds of rejection is respectfully requested in view of the remarks herein.

#### Summary of the Office Action

Claims 1-15 are rejected under 35 U.S.C. § 102(e) as being clearly anticipated by U.S. Patent 6,272,470 to Teshima.

#### Rejection of claims 1-5

In rejecting claims 1-15, the Office Action states that

Teshima '470 teaches all the features of the instant invention including a stand-alone workstation connected to the imaging modalities (See Fig. 1, elements 1-4) and an independent removable medium (see Fig. 1, element 3 and 6), which include a number of saving capabilities including CD-ROM (see Fig. 2, all the saving capabilities are listed under element 13). Furthermore, the invention includes the DICOM communication system (as indicated by Fig. 1 being connected between element 3 and element 2).

As Applicants understand the rejection, the Fig. 1 elements referenced in the Office Action are diagnostic medical imaging modality 1, image server 2, electronic clinical recording system 3, and in-house LAN 4.

With respect to claim 1, a review of the patent text for the Teshima elements identified in the Office Action illustrates that Teshima fails to disclose both the recited standalone computer workstation and the recited removable medium recording station. Moreover, Teshima fails to

teach or suggest the four separate storage devices as claimed. As pointed out in MPEP § 2131, “[to] anticipate a claim, the reference must teach every element of the claim.” Applicants respectfully assert that the rejection under 35 U.S.C. § 102 (e) should be withdrawn because Teshima does not teach or suggest each feature of independent claim 1. Furthermore, Applicants respectfully assert that dependent claims 2-5 are allowable at least because of their dependence on claim 1 and the reasons set forth above.

Claims 16-43 are added and are allowable over the cited art.

### CONCLUSION

Applicants respectfully submit all pending claims, including new claims 16-43, are in condition for allowance. An early notice to this effect is earnestly solicited. Should there be any questions regarding the application, the Examiner is invited to contact the undersigned representative to expedite prosecution. If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-0310. If a fee is required for an extension of time under 37 C.F.R. § 1.136 not accounted for above, such an extension is requested, and the fee should also be charged to our Deposit Account.

Respectfully submitted,

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By:

  
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